

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

SUSAN KINDER)	
)	
Plaintiff)	CASE NO. 1:22-cv-01952-TWP-MJD
)	
vs.)	
)	
MARION COUNTY PROSECUTOR'S)	
OFFICE,)	
)	
Defendant.)	

PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LISTS

Plaintiff Susan Kinder, by counsel, submits the following witness and exhibit lists pursuant to the Court's Order.

A. Witnesses

1. Plaintiff – may be contacted through her attorney, the undersigned;
2. Lydia Richardson, former CAC employee. Richardson is expected to testify as to her allegations against Plaintiff and Richardson's reassignment.
3. Celita Scott, Chief Counsel, Marion County Prosecutor's Office. Ms. Scott is expected to testify as to the investigation into the complaints made by Richardson against Plaintiff, findings of said investigation, and decision to reassign Plaintiff and Richardson.
4. Stephanie Bibbs, Chief Deputy of Criminal Charging, Marion County Prosecutor's Office. Address and phone to be supplied by Defendant. Ms. Bibbs is expected to testify regarding her involvement in the investigation of the allegations against Plaintiff.

5. Ryan Mears, Prosecuting Attorney, Marion County Prosecutor's Office. Phone number to be supplied by Defendant. Mr. Mears is expected to testify regarding the MCPO's policies relating to the investigation of complaints and the retention of records relating to those investigations.
6. Kimberly Rasheed, CAC Director, Marion County Prosecutor's Office. Address and phone to be supplied by Defendant. Ms. Rasheed is expected to testify regarding performance of Petitioner and Richardson during their tenure at the CAC.
7. Erin Warnner, CAC Director, Marion County Prosecutor's Office. Address and phone to be supplied by Defendant. Ms. Warnner is expected to testify regarding performance of Petitioner and Richardson during their tenure at the CAC, as well as roles and responsibilities of Advocates.
8. Cynthia Oetjen, CAC Director, Marion County Prosecutor's Office. Address and phone to be supplied by Defendant. Ms. Oetjen is expected to testify regarding performance of Petitioner and Richardson during their tenure at the CAC, as well as the roles and responsibilities of Advocates.
9. Jeff Knoop, Assistant Director, Marion County Prosecutor's Office. Address and phone to be supplied by Defendant. Mr. Knoop is expected to testify regarding performance of Petitioner and Richardson during their tenure at the CAC, as well as the roles and responsibilities of Advocates.
10. Domini Eldridge, Supervisor, Marion County Prosecutor's Office. Address and phone to be supplied by Defendant. Ms. Eldridge is expected to testify regarding Plaintiff's role and responsibilities as 3rd floor receptionist.

11. All witnesses uncovered during discovery or identified by the Defendant.

Plaintiff reserves the right to amend or supplement the preliminarily identified witnesses subject to their ongoing investigation and pending the discovery process. Plaintiff reserves the right to use at trial witnesses not identified herein but who subsequently are identified during discovery.

B. Exhibits

1. Plaintiff's employment records.
2. Richardson's personnel records.
3. Scott's personnel records.
4. Any correspondence, including but not limited to emails and instant messages, sent to or from Plaintiff or any employee of the MCPO concerning the Plaintiff's employment and work history, or roles and responsibilities of Advocates.
5. Relevant job descriptions.
6. Marion County Prosecutor's Office/CAC employee demographic records.
7. Documents disclosed in discovery.
8. All documents in the possession of the Defendant relating to this case, but not yet disclosed.
9. Documents necessary for impeachment at trial.

Plaintiff reserves the right to amend or supplement the preliminary identified exhibits subject to her ongoing investigation and depending on the discovery process. Plaintiff reserves the right to use at trial exhibits not identified herein but which are subsequently identified during discovery.

Respectfully submitted,

/s/ Thomas Roberts

Thomas Roberts, Attorney No. 35442-48

Zentz & Roberts, P.C.

155 E. Market Street, Ste. 700

Indianapolis, IN 46204

Ph: (317) 350-0700

Fax: (317) 577-1102

E-mail: thomas@cmzentzlaw.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2022, the foregoing document was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system.

Alexander Carlisle
Office of Attorney General
302 W. Washington St., 5th Floor
Indianapolis, IN 46204
Ph: (317) 234-6667
Fax: (317) 232-7979
Email: Alexander.Carlisle@atg.in.gov
Attorney for Defendant

/s/ Thomas Roberts

Thomas Roberts (#35442-48)

Zentz & Roberts, P.C.

155 E. Market St., Suite 700

Indianapolis, IN 46204